



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 24, 2022

BY ECF

The Honorable Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007


Re: *United States v. Dennis*, 20 Cr. 623 (LGS)

Dear Judge Schofield:

The Government respectfully submits this letter in response to the defendant's supplemental letter, dated January 24, 2022 (Dkt. No. 23), enclosing additional medical records recently obtained by the defendant from a second surgeon (the "Surgeon") in support of the defendant's bail modification request. There is nothing in those medical records that validates the defendant's claim that his location monitoring bracelet—which, weighs only 6.1 ounces, and not the one pound that the defendant represented to the Surgeon—caused or is exacerbating a hernia.¹ For all the reasons previously stated in the Government's letter, dated January 12, 2022 (Dkt. No. 19), the Court should deny the defendant's request to have his monitoring bracelet removed. At a minimum, the Court should defer its ruling until after the parties have had the opportunity to retain doctors with the appropriate specialties who can examine the defendant and provide the Court with a second opinion, as ordered by this Court on January 13, 2022 (Dkt. No. 21).

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: 

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Assistant United States Attorney
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cc: Neil Kelly, Esq. (by ECF)
Josh Rothman, Pretrial Services Officer (by Email)

¹ If and when the defendant undergoes surgery for a hernia, the Government has no objection to having the location monitoring bracelet temporarily removed solely for the surgery, and then immediately placed back on the defendant.